

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER XIII
:
DIVIA D. HAIRSTON : 1:22-00075
Debtors :
:

M & T BANK :
Movant :

vs. :

DIVIA D. HAIRSTON :
Debtor :

MITCHELL THOMAS :
TERESA SMITH, :
Co-Debtors :

And :
JACK N. ZAHAROPOULOS, :
Trustee :

ANSWER TO MOTION FOR RELIEF

NOW COMES the Debtor, DIVIA D. HAIRSTON, by and through her attorney, Charles E. Petrie, and respectfully answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor has made or will make all outstanding post-petition payments.
7. Denied. Debtor has made or will make all outstanding post-petition payments.

8. Denied. It is denied that Movant is entitled to relief from the automatic stay.

9. Denied. It is denied that Movant is entitled to reimbursement of legal fees and costs associated with this action.

10. No responsive pleading required.

WHEREFORE, Debtor respectfully requests that Your Honorable Court dismiss Movant's Motion for Relief.

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, PA 17111
(717) 561-1939
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER XIII

DIVIA D. HAIRSTON : 1:22-00075

Debtors :

M & T BANK :

Movant :

vs. :

DIVIA D. HAIRSTON :

Debtor :

MITCHELL THOMAS :

TERESA SMITH, :

Co-Debtors :

And :

JACK N. ZAHAROPOULOS, :

Trustee :

CERTIFICATE OF SERVICE

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, addressed as follows, or by electronic means:

REBECCA A. SOLARZ ESQUIRE
KML LAW GROUP OC
BNY MELLON INDEPENDENCE CENTER
701 MARKET STREET SUITE 5000
PHILADELPHIA, PA 19106

JACK N. ZAHAROPOULOS, ESQUIRE, TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036

DATE: 04/22/2022

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, PA 17111
(717) 561-1939
Attorney for Debtor
ID# 29029